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Memorandum

To: Mark Taylor/David Porter, SOUTHDIV
Tonya Barker/Rob Williamson, NSA Memphis
Brian Donaldson, USEPA
Jim Morrison, TDEC
Jack Carmichael, USGS

From: Robert Smith, EnSafe

Date: April 17, 1998

RE: Response to Comments; SWMU 18 VCA Soil Removal and Followup Geoprobe Investigation, Revision: 01; NSA Memphis RFI; Millington, Tennessee: CTO-094

This response to comments is intended to aid the review process and insure an expedited approval of the SWMU 18 VCA Soil Removal and Followup Geoprobe Investigation work plan. Comments were received verbally from TDEC, and via e-mail from EPA. If you have any questions or concerns about the work plan, or the following responses to your comments, please give me a call at (901) 372-7962.

TDEC Comment #1: Pg. 1, 2nd paragraph: "Approximately 45 cubic yards of soil were excavated from both sides of the liner during the removal of the fiberglass tank." Where is this soil now?

Response: The soil was placed in roll-off boxes, characterized, and disposed of by the NSA Memphis Public Works Office. The text has been changed to clarify this.

TDEC Comment #2; Pg. 2, 3rd paragraph: "Analytical results and a sample location map for the screening investigation are included as Attachment 1." Attachment 1 is missing.

Response: Analytical results and a sample location map for the screening investigation are included as Figure 2. The text has been changed to clarify this.

TDEC Comment #3; Pg. 3, bullet #6: TPH confirmation samples should be analyzed using the field IR due to the potential for volatilization of the petroleum constituents during sample handling and transport to the laboratory. An additional QA/QC should be added during the analysis of these samples. Also, VOC confirmation samples should be collected from undisturbed soil, approximately 1 to 2 feet below the bottom of the excavation. VOC confirmation samples should consist of 2 primary samples and one duplicate sample.

Response: The confirmation sampling procedures have been modified to reflect these changes.

TDEC Comment #4; Figure 2: Figure 2 assumes a north-northeast groundwater flow direction. Please show the flow direction on the figure, and verify flow direction. In the event the flow direction is to the north-northwest, adjust proposed sampling locations accordingly.

Response: According to the RCRA Facility Investigation Work Plan - SWMUs 15/21, groundwater flow in the fluvial deposits in the SWMU 21 area (located approximately 500 feet north of SWMU 18) is to the north-northeast. Therefore, the proposed groundwater sample locations will provide adequate downgradient groundwater data. The groundwater flow direction has been added to the figure, and the text has been revised to include this information.

EPA Comment #1; Pg. 3, bullet# 9: Will the proposed disposal procedures result in the same situation seen at SWMU 5?

Response: The delay in the disposal of the soil generated during the SWMU 5 VCA soil removal was due to the vast amounts of soil and the need for regulatory interpretation concerning the number and type of disposal samples. The extent of the soil contamination at SWMU 18 is better defined than at SWMU 5; therefore, the amount of soil to be removed is know to within ± 10 yards, rather than $\pm 1{,}000$ yards.

EPA Comment #2; Pg. 4, 1st paragraph: The BCT will not be able to review the data if the specified 28-day turn around time is used.

Response: The turn around time for the samples collected will be 48-hours. The text has been revised.